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Attorneys for Plaintiff
G & G CLOSED CIRCUIT EVENTS, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

G & G CLOSED CIRCUIT EVENTS,
LLC,

Plaintiff,

vs.

OSCAR DORADO AGUILAR,

Defendant.

Case No. 1:20-cv-01745-JLT-BAM

STIPULATION AND ~~PROPOSED~~
ORDER RE CONTINUING PRE-TRIAL
CONFERENCE

COME NOW Plaintiff G & G Closed Circuit Events, LLC (“G & G”) and Defendant Oscar Aguilar and stipulate as follows:

I. RECITALS

1. WHEREAS the Parties’ Pre-trial Statement is due on December 11, 2023;
2. WHEREAS a Pre-trial Conference is set for December 18, 2023 at 1:30 p.m.;
3. WHEREAS trial is set for February 24, 2023;
4. WHEREAS Aguilar has not responded his attorney Trevor McCann’s five emails, two text messages, and two phone call/voicemails since September 22, 2023;
5. WHEREAS Aguilar responded to discovery about facts traditionally considered by district courts in assessing liability and damages in signal piracy cases;
6. WHEREAS the Parties’ attorneys have met and conferred twice to address the issues of liability and the prospect of Aguilar stipulating to liability to avoid trial on that issue and to conserve judicial and party resources, and for the Court to decide damages by G & G’s motion; and
7. WHEREAS Aguilar was sued as an individual and there are no statutory entity defendants (*e.g.*, corporation, llc).

II. STIPULATION

THEREFORE, the Parties stipulate as follows:

1. Continuing the Pre-trial conference for 30 days to January 17, 2024 will allow time for Aguilar to respond to McCann’s communications;
2. If Aguilar does not respond, the Parties have met and conferred about McCann moving the Court to be relieved as counsel of record;
3. An Order on the Parties’ stipulation will conserve judicial and Party resources.

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Respectfully submitted,

Dated: December 8, 2023

/s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

G & G Closed Circuit Events, LLC

Dated: December 8, 2023

/s/ Trevor McCann

COLLINS AND COLLINS, LLP

By: Trevor Brandt McCann

Attorneys for Defendant

Oscar Dorado Aguilar

ORDER

On reading the Parties' Stipulation, this Court finds good cause to continue to the Pre-trial conference to January 17, 2024 at 1:30 p.m. The Parties' Joint Pre-trial Statement shall be filed seven days in advance on January 10, 2024.

All other dates shall remain unchanged.

IT IS SO ORDERED.

Dated: **December 11, 2023**


UNITED STATES DISTRICT JUDGE